

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

DANNY MORA ORTIZ
CARMEN A. GONZALEZ RODRIGUEZ

DEBTORS

CASE NO. 05-07520(SEK)

CHAPTER 13

STIPULATION

TO THE HONORABLE COURT:

COMES NOW, Debtor and R&G Mortgage Corporation, thereafter R-G, through their respective attorneys, and respectfully state and pray as follows:

1. On February 28, 2006, creditor filed a Motion to Dismiss because debtors were six months behind in their payments to R-G, amounting to \$4,385.06.
2. On March 30, 2006, debtor filed a Reply to R-G Motion to Dismiss and also filed an amended plan consenting to the lift of stay in favor of creditor R-G.
3. The parties have agreed to enter into this agreement in order to expedite the procedure regarding the lift of stay, so that R-G does not have to wait until the hearing on confirmation of the proposed plan dated March 30, 2006, that has not been scheduled yet.
4. So the parties agreed that upon approval of this Stipulation, the lift of stay is granted regarding the collateral of R-G mortgage in this case.
5. The provisions of this Stipulation shall be effective upon its approval by this Honorable Court.

WHEREFORE, Debtor and secured creditor R&G, respectfully request from this Honorable Court, the approval of this Stipulation.

N O T I C E

You are hereby notified of the Stipulation between Debtor and R&G Mortgage. Unless an objection is filed within fifteen (15) days from notice, an order may be entered approving the same without further notice or hearing. Should a timely objection is filed, the Court will then schedule a hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on the 11th day of May, 2006.

LUBE & SOTO LAW OFFICES
Attorney for Debtors
702 Union St., Apt. G-1—Cond. Unimar
San Juan, PR 00907-4202
Tel. (787) 722-0909 FAX: 787-977-1709
Email: lubeyso@ yahoo.com

CARDONA JIMENEZ LAW-OFFICE
Attorney for R-G Mortgage Corp.
PO Box 9023593
San Juan, PR 00902-3593
Tel. (787) 724-1303 – FAX: 787-724-1369
email: jrodriguez@cardonalaw.com

By: _____
s/Madeline Soto Pacheco
USDC-PR 207910

By: _____
s/Jorge A. Rodriguez-Fraticelli
USDC-PR 125103

CHAPTER TRUSTEE'S OFFICE
PO BOX 90223884
San Juan, PR 00902-3884
Email: ecfmail@ch13-pr.com

By: _____
s/Jose R. Carrion Morales